

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANDREW M. CUOMO,

Movant,

v.

LINDSEY BOYLAN,

Respondent.

Case No. 23-mc-01587 (LDH)

Oral Argument Requested

**NOTICE OF CROSS-MOTION BY NON-PARTY LINDSEY BOYLAN TO QUASH THE
SUBPOENA BY DEFENDANT ANDREW M. CUOMO**

PLEASE TAKE NOTICE, that upon Non-Party Lindsey Boylan's accompanying Memorandum of Law, the Declaration of Julie R. F. Gerchik and the exhibits attached thereto, and all prior pleadings and papers on file in the above-captioned action and *Trooper 1 v. New York State Police*, No. 22-cv-00893 (LDH) (TAM) (E.D.N.Y.), Ms. Boylan hereby cross-moves this Court pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure for an order quashing the subpoena served on Ms. Boylan in the action entitled, and granting such further relief as the Court deems just and proper.

Dated: June 28, 2023
New York, New York

Respectfully submitted,

/s/ E. Danya Perry

E. Danya Perry

Rachel Fleder

Perry Law PLLC

157 East 86th Street, 4th Floor

New York, NY 10028

Phone: 646-974-0935

Fax: 646-849-9609

Email: dperry@danyaperryllaw.com

Julie R. F. Gerchik (*pro hac vice motion
pending*)

Glaser Weil Fink Howard Jordan & Shapiro
LLP

10250 Constellation Blvd.

Suite 1900

Los Angeles, CA 90067

310-553-3000

Fax: 310-556-2920

Email: jgerchik@glaserweil.com

Attorneys for Respondent Lindsey Boylan